

**OUTTEN & GOLDEN LLP**

Moira Heiges-Goepfert (Cal. Bar No. 326861)  
One California Street, 12th Floor  
San Francisco, CA 94111  
Telephone: (415) 991-8514  
Facsimile: (415) 638-8810  
mhg@outtengolden.com

Sophia L. Hall (*pro hac vice*)

**LAWYERS FOR CIVIL RIGHTS**

61 Batterymarch Street, 5th Floor  
Boston, MA 02110  
Telephone: (617) 482-1145  
Facsimile: (617) 482-4392  
shall@lawyersforcivilrights.org

**McGUIREWOODS LLP**

Anthony Q. Le (SBN 300660)  
Two Embarcadero Center, Suite 1300  
San Francisco, CA 94111-3821  
Telephone: 415.844.9944  
Facsimile: 415.844.9922

K. Issac deVyver (*pro hac vice*)

Karla Johnson (*pro hac vice*)

Tower Two-Sixty  
260 Forbes Avenue, Suite 1800  
Pittsburgh, PA 15222  
Telephone: 412.667.6000  
Facsimile: 412.667.6050

*Attorneys for Defendants*

*Attorneys for Plaintiffs and the Proposed Class  
(Additional Counsel Listed on Signature Page)*

*Social Finance, Inc. d/b/a SoFi and  
SoFi Lending Corp. d/b/a SoFi*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RUBEN JUAREZ, CALIN CONSTANTIN  
SEGARCEANU, EMILIANO GALICIA, and  
JOSUE JIMENEZ, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

vs.

SOCIAL FINANCE, INC. d/b/a SOFI, and  
SOFI LENDING CORP. d/b/a SOFI,

Defendants.

Case No.: 4:20-cv-03386-HSG

**JOINT STIPULATION AND ORDER TO  
FURTHER STAY LITIGATION**

District Judge: Haywood S. Gilliam, Jr.  
Complaint filed: May 19, 2020  
First Amended Complaint Filed: July 30, 2020  
Second Amended Complaint Filed: May 3,  
2021

Pursuant to Civil Local Rules 6-1(b) and 6-2, Plaintiffs Ruben Juarez, Calin Constantin Segarceanu, Emiliano Galicia, and Josue Jimenez ("Plaintiffs"), through counsel, along with counsel for Defendants Social Finance, Inc. d/b/a SoFi and SoFi Lending Corp. d/b/a SoFi

(collectively, “SoFi,” and together with Plaintiffs, the “Parties”), respectfully submit the following Joint Stipulation and Proposed Order to Further Stay Litigation.

### **RECITALS**

WHEREAS, on May 19, 2020, Plaintiff Juarez filed a putative class action Complaint against SoFi in the above-captioned matter, asserting violations of the Civil Rights Act of 1866, 42 U.S.C. § 1981, and the California Unruh Civil Rights Act, Cal. Civil Code §§ 51, *et seq.*, (D.E. 1);

WHEREAS, on July 30, 2020, Plaintiffs Juarez and Segarceanu filed a First Amended Complaint, adding named Plaintiff Segarceanu and claims under the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* (D.E. 33);

WHEREAS, on May 3, 2021, Plaintiffs filed a Second Amended Complaint (as authorized by the Court), incorporating additional named Plaintiffs Jimenez and Galicia (D.E. 56, 62);

WHEREAS, on July 15, 2021, the Parties participated in a private mediation session with JAMS arbitrator David Geronemus, Esq., during which they were unable to reach a settlement;

WHEREAS, on November 3, 2021, the Court approved the Parties’ Joint Stipulation seeking to stay the case through December 28, 2021 in order to focus on continued settlement discussions (D.E. 84);

WHEREAS, on December 28, 2021, the Parties provided an update to the Court that substantial process was made towards settlement (D.E. 85), and on January 3, 2022 the Court approved the Parties’ Joint Stipulation seeking to further stay the case through January 27, 2022 (D.E. 86);

WHEREAS, on January 27, 2022, the Parties filed a Joint Stipulation updating the Court that they had reached an agreement to settle the case in principle, and seeking to extend the stay of discovery through March 28, 2022 (D.E. 87), which the Court approved on January 28, 2022 (D.E. 88);

WHEREAS, on March 25, 2022, the Parties filed a Joint Stipulation updating the Court that they had documented a written settlement agreement, and seeking to further extend the stay of

1 discovery through April 11, 2022 (D.E. 89), which the Court approved on March 25, 2022 (D.E.  
2 90);

3 WHEREAS, since that time, the Parties have been working diligently to finalize the  
4 settlement agreement, notice, claim form and other settlement documents, and to secure approvals  
5 necessary for execution;

6 WHEREAS, the Plaintiffs expect to file for preliminary approval by April 20;

7 WHEREAS, a continued stay will further conserve judicial resources and allow the Parties  
8 to continue efforts towards documenting settlement; and

9 WHEREAS, the Parties affirm that no party will be prejudiced by this stipulation, nor will  
10 the requested extension unduly delay the case;

11 **STIPULATION**

12 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs  
13 and SoFi through their respective undersigned counsel that:

- 14 1. All formal discovery, discovery obligations and motion practice shall be suspended  
15 and stayed for another 9 days (until April 20, 2022) to enable the Parties to conserve  
16 resources and focus their efforts on settlement;
- 17 2. Plaintiffs will file for preliminary approval on or before April 20, 2022, or the parties  
18 will submit an update to the Court in which they will apprise the Court of the  
19 expected timing for the filing of a motion for preliminary approval;
- 20 3. This stipulation is without prejudice to the rights, claims, arguments, and defenses of  
21 all Parties; and
- 22 4. All other signatories listed, and on whose behalf the filing is submitted, concur with  
23 the content in this Stipulation and have authorized the filing.

24 IT IS SO STIPULATED.

OUTTEN & GOLDEN LLP

MCGUIRE WOODS LLP

Dated: April 11, 2021

Dated: April 11, 2021

By: /s/ Ossai Miazad  
Ossai Miazad (*pro hac vice*)  
685 Third Avenue, 25th Floor  
New York, NY 10017  
Telephone: (212) 245-1000  
Facsimile: (646) 509-2060  
om@outtengolden.com

By: /s/ K. Issac deVyver  
K. Issac deVyver (*pro hac vice*)  
Karla Johnson (*pro hac vice*)  
Tower Two-Sixty  
260 Forbes Avenue  
Suite 1800  
Pittsburgh, PA 15222  
Telephone: 412.667.6000  
Facsimile: 412.667.6050

Moira Heiges-Goepfert (Cal. Bar No. 326861)  
OUTTEN & GOLDEN LLP  
One California Street, 12th Floor  
San Francisco, CA 94111  
Telephone: (415) 991-8514  
Facsimile: (415) 638-8810  
mhg@outtengolden.com

Anthony Q. Le (SBN 300660)  
Two Embarcadero Center  
Suite 1300  
San Francisco, CA 94111-3821  
Telephone: 415.844.9944  
Facsimile: 415.844.9922

Sophia L. Hall (*pro hac vice*)  
LAWYERS FOR CIVIL RIGHTS  
61 Batterymarch Street, 5th Floor  
Boston, MA 02110  
Telephone: (617) 482-1145  
Facsimile: (617) 482-4392  
shall@lawyersforcivilrights.org

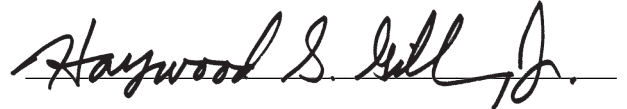
*Attorneys for Defendants*  
*Social Finance, Inc. d/b/a SoFi and*  
*SoFi Lending Corp. d/b/a SoFi*

*Attorneys for Plaintiffs Ruben Juarez, Calin*  
*Constantin Segarceanu, Emiliano Galicia,*  
*Josue Jimenez and the Proposed Class*

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED,**

DATED: 4/12/2022

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", written over a horizontal line.

Haywood S. Gilliam, Jr.  
United States District Judge